

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHARLENE TALARICO,

Index No. 18-00909 (JPO)

Plaintiff,

-against-

**DECLARATION OF
RICHARD SOTO**

PORT AUTHORITY OF NEW YORK AND NEW
JERSEY,

Defendants.

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RICHARD SOTO, an attorney admitted to practice in the courts of the State of New York and the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. § 1746, hereby declares:

1. I am an associate at the firm Advocates for Justice, Chartered Attorneys, counsel for the plaintiff in the above referenced matter (“Plaintiff”). I submit this Declaration in support of Plaintiff’s Response to Defendant’s Motion for Summary Judgment. I am fully familiar with the facts and circumstances set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy the Deposition of Charlene Talarico (“Tal. Dep.”), dated August 14, 2020.

3. Attached hereto as Exhibit B is a true and correct copy of the Deposition of Joseph Panio (“Panio Dep.”), dated October 20, 2020.

4. Attached hereto as Exhibit C is a true and correct copy of the Deposition of Dr. Pascale Kerlegrand (“Kerl. Dep.”), dated October 19, 2020.

5. Attached hereto as Exhibit D is a true and correct copy of Defendant’s Response to Plaintiffs’ Interrogatories, dated June 21, 2019.

Dated: New York, New York
May 17, 2021

/s/ Richard Soto

Richard Soto